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June 5, 2019

VIA ECF

Honorable Steven M. Gold
United States Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Honickman, et al. v. BLOM Bank SAL*, No. 1:19-cv-00008-KAM-SMG –
Motion for Adjournment of Initial Conference

Dear Judge Gold:

Pursuant to Section 1.D of the Court's Individual Practices, Defendant respectfully moves, with Plaintiffs' consent, for an adjournment *sine die* of the initial conference, which has been re-scheduled for June 21, 2019 at 4:30 p.m. (Re-Scheduling Order dated May 23, 2019).

Defendant requests the adjournment in light of the motion to dismiss that Defendant served (but did not file) on June 3, 2019. Plaintiffs' response to the motion is due on July 8, 2019, and Defendant's reply is due on July 29, 2019. (Minute Entry dated May 15, 2019). Defendant believes there is no need for the parties to exchange any discovery during the pendency of the motion and therefore requests that the initial conference be rescheduled only in the event that Defendant's motion is denied. Plaintiffs agree that it makes sense for the parties to postpone their exchange of initial discovery during the pendency of the motion to dismiss and join in this request for an adjournment of the scheduled conference.

Plaintiffs further advise us (and, by means of this letter, the Court) that they nonetheless anticipate the need to seek leave, during the pendency of the motion, to serve preservation subpoenas pursuant to Federal Rule of Civil Procedure 45 on certain non-parties to whom they have sent (or intend to send) litigation hold letters. Defendant reserves the right to object to such a request.



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No party has previously requested an extension or adjournment of the initial conference, and all parties join in requesting this adjournment.

Respectfully,

/s/ Linda C. Goldstein

Linda C. Goldstein

cc: All Counsel (via ECF)